



PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted  
herewith.

/s/Alan S. Naar

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Dated: March 11, 2020

**Exhibit 1***Roofers' Pension Fund v. Papa, et al.*, Civ. No. 2:16-cv-2805 (MCA)(LDW)

## INDEX TO MOTION TO SEAL -- REGARDING THE PARTIES' FEBRUARY 26, 2020 LETTERS TO THE COURT

<b>Defendants' requested redactions</b>					
<b>Material</b>	<b>Basis for Sealing</b>	<b>Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted</b>	<b>Why Less Restrictive Alternative is not available</b>	<b>Prior Sealing</b>	<b>Party in Opposition to Sealing, if any, and basis</b>
Defendants' February 26, 2020 Letter, with respect to the paragraph on page two beginning with "Among the document requests" and ending with "actions shortly thereafter."	Confidentiality	Confidential information regarding Defendant's business operations would be exposed.	Redactions already limited to confidential information.	Yes	No opposition
Defendants' February 26, 2020 Letter, with respect to the final paragraph on page three (continuing onto page four) beginning with "On February 10" and ending with "provided to plaintiffs."	Confidentiality	Confidential information regarding Defendant's business operations would be exposed.	Redactions already limited to confidential information.	Yes	No opposition
Defendants' February 26, 2020 Letter, Attachment A	Non-public discovery materials; Relates to ongoing government investigation.	Non-public discovery materials would be exposed; Sensitive information regarding the Government's investigation would be exposed.	Redactions already limited to confidential and sensitive information.	Yes	No opposition

**Exhibit 1***Roofers' Pension Fund v. Papa, et al.*, Civ. No. 2:16-cv-2805 (MCA)(LDW)

## INDEX TO MOTION TO SEAL -- REGARDING THE PARTIES' FEBRUARY 26, 2020 LETTERS TO THE COURT

<b>Class Plaintiffs' requested redactions</b>					
<b>Material</b>	<b>Basis for Sealing</b>	<b>Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted</b>	<b>Why Less Restrictive Alternative is not available</b>	<b>Prior Sealing</b>	<b>Party in Opposition to Sealing, if any, and basis</b>
February 26, 2020 Letter, with respect to the second to last sentence in the final paragraph on page one beginning with "that if the United States" and ending with "deposition should be stayed."	The DOJ asserts that the information relates to ongoing government investigation.	The DOJ asserts that confidential information regarding the Government's investigation would be exposed.	Redactions already limited to sensitive information regarding government investigation.	Yes	No Opposition
February 26, 2020 Letter, with respect to the portion of the first sentence in the first paragraph on page two beginning with "particularized justification" and ending with "be stayed."	The DOJ asserts that the information relates to ongoing government investigation.	The DOJ asserts that confidential information regarding the Government's investigation would be exposed.	Redactions already limited to sensitive information regarding government investigation.	Yes	No Opposition
February 26, 2020 Letter, with respect to the portion of the third sentence in the first paragraph on page two beginning with "all ten" and ending with "stayed."	The DOJ asserts that the information relates to ongoing government investigation.	The DOJ asserts that sensitive information regarding the Government's investigation would be exposed.	Redactions already limited to sensitive information regarding government investigation.	Yes	No Opposition

**Exhibit 1***Roofers' Pension Fund v. Papa, et al.*, Civ. No. 2:16-cv-2805 (MCA)(LDW)

INDEX TO MOTION TO SEAL -- REGARDING THE PARTIES' FEBRUARY 26, 2020 LETTERS TO THE COURT

<b>Class Plaintiffs' requested redactions cont.</b>					
<b>Material</b>	<b>Basis for Sealing</b>	<b>Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted</b>	<b>Why Less Restrictive Alternative is not available</b>	<b>Prior Sealing</b>	<b>Party in Opposition to Sealing, if any, and basis</b>
February 26, 2020 Letter, Exhibit 1	The DOJ asserts that the information relates to ongoing government investigation.	The DOJ asserts that sensitive information regarding the Government's investigation would be exposed.	Redactions already limited to sensitive information regarding government investigation.	Yes	No Opposition